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Via Electronic Filing

Honorable Leda Dunn Wettre, U.S.M.J
United States District Court
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: Deborah Gross-Quatrone v. Bonnie Mizdol, et al.
Docket No.: 2:17-cv-13111-SDW-LDW

Dear Judge Wettre:

Pursuant to Your Honor's judicial preferences, Defendants hereby request leave to file a Motion for Summary Judgment seeking dismissal of each of the Plaintiff's remaining claims pursuant to Federal Rule of Civil Procedure 56 (hereinafter "Motion"). All discovery is complete with the exception of the depositions of Plaintiff's treating physicians, which pertain only to damages and will have no bearing on Defendants' Motion. As the issues to be raised in Defendants' Motion are ripe for consideration, Defendants' request leave to file their Motion at this time. Defendants' Motion will argue that summary judgment should be granted as a matter of law on all remaining counts and there are no genuine issues of material fact that preclude summary judgment.

Please do not hesitate to have your chambers contact me with any questions or concerns.

Respectfully submitted,
BROWN & CONNERY, LLP
s/ Kathleen E. Dohn
Kathleen E. Dohn

cc: Ralph Ferrara, Esquire (*via electronic mail*)
Kevin Kotch, Esquire (*via electronic mail*)
William Tambussi, Esquire (*via electronic mail*)
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